

TENNESSEE REGULATORY AUTHORITY

Sara Kyle, Chairman
Deborah Taylor Tate, Director
Pat Miller, Director
Ron Jones, Director



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460 James Robertson Parkway
Nashville, Tennessee 37243-0505

TN REGULATORY AUTHORITY
DOCKET ROOM

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APR 04 2003

SARA KYLE, COMMISSIONER
TN PUBLIC SERVICE COMM.

MEMORANDUM

TO: Chairman Sara Kyle
Director Deborah Taylor Tate
Director Pat Miller
Director Ron Jones

FROM: Colleen Edwards, Telecommunications Consultant
Arnold Reed, Telecommunications Consultant

AK by CE

DATE: April 4, 2003

RE: A review of Performance Measures and Self-effectuating Enforcement Mechanisms,
for the Interim Tennessee Performance Plan.

On April 26, 2002 BellSouth submitted its third Section 271 filing to the Authority in docket 97-00309. On August 7, 2002, the parties reached a proposed settlement agreement which ultimately affected three dockets: 1.) 97-00309 Section 271; 2.) 01-00193 Performance Measures; and 3.) 01-00362 OSS. With regard to Docket No. 01-0193, the parties requested that the Authority adopt, as the Tennessee Performance Assurance Plan, the service quality measurements and self-effectuating enforcement mechanism adopted by the Florida Public Service Commission as they presently exist and are modified in the future, as well as the special access measures developed by the Authority in Docket No. 01-00193. The Florida plan would be effectuated no later than December 1, 2002, while the special access measures would be deployed shortly thereafter. The parties agreed that in the interim, prior to December 1, 2002, BellSouth would implement the Georgia Performance Plan and Self-effectuating Enforcement Mechanism. The proposed settlement agreement received unanimous support from the Authority. The interim performance plan, Georgia Performance Plan with Tennessee specific information, commenced August, 2002, the corresponding SEEM commenced 45-days later with the payments for Tier-1 penalties paid to the CLECs commencing in September and Tier-2 penalties paid to the State commencing in November.¹

Attached is a synopsis of the performance measure results through November of 2002. These results indicate that BellSouth's performance remains relatively unchanged since its Section 271 review conducted by the Authority. The areas that BellSouth missed

¹ Tier-1 penalties are fees paid directly to the CLECs for CLEC or regional performance failures; Tier-2 penalties are fees paid directly to the State when BellSouth fails to meet the benchmark or parity for a set measure, on the aggregate for the state, for three consecutive months.

consistently continue to be areas of needed improvement. Although BellSouth's performance has not improved in these areas its performance has not deteriorated post-271. Primary areas of concern include those measurements with a volume of at least 100 CLEC orders for which BellSouth has failed to achieve the benchmark² or parity³ comparison for six or more months out of the preceding year. In the "General" category, these measurements include Flow-Through⁴ and Acknowledgement Message Completeness⁵ for the mechanized system known as "TAG⁶." In the UNE category, these measurements include Percent Provisioning Troubles Within 30 Days of Service Order Activity, Percent Jeopardies for Mechanized Orders, Missed Repair Appointments, Percent Missed Installation Appointments and Reject Interval for Mechanized Orders. In the Resale category, these measurements include Customer Trouble Report Rate, Service Order Accuracy, Reject Interval for Mechanized Orders, FOC & Reject Response Completeness (non-mechanized) and Percent Provisioning Troubles Within 30 Days of Service Order Activity. In the OSS category, these measurements include Average Response Interval for the following mechanized systems: CRIS⁷, NIW⁸, LMOS⁹, LNP¹⁰ and OSPCM¹¹. In the "Local Interconnection Trunks" category, BellSouth failed the "Invoice Accuracy" measurement on CLEC bills totaling \$1,999,162.

Self-Effectuating Enforcement Mechanisms (SEEMs) began in Tennessee with Tier-1 payments for August results. Payments commenced 45-days after the end of the reporting month. Tier-2 payments commenced in Tennessee after three consecutive months of performance failures, with the first Tier-2 payments occurrence in November. For the Interim Performance measures, BellSouth has paid out \$2,177,953.00 in Tier-I penalties and \$212,086.84 in Tier-2 penalties. The manner in which SEEM payments are calculated, a complicated set of formulas where disaggregated data is re-aggregated, makes comparison of SEEM payments and performance results difficult to reconcile. As an example in the month of November BellSouth met 86% of its performance measures and yet paid \$1,034,714.00 in Tier-1 penalties. This was the result of a failure of one performance measure, *Order Completion Interval- UNE-P*, the failure of this one measure accounted for \$786,808.00 of the total Tier-1 penalties. It is also difficult to compare Tennessee SEEM payments with those of BellSouth's other states. This is due in part to the varying product offerings of the different CLECs doing business in different

² A benchmark is a fixed standard that BellSouth is expected to achieve.

³ Parity measurements are those for which the level of service that BellSouth provides to its CLEC customers is compared to the level of service that it provides to BellSouth's own retail arm. It is important to note that unequal results do not necessarily indicate inequitable treatment. This is due to "Delta". Delta is the statistical method used to determine when two comparable items are not equal at which point is it statistically significant to determine disparate treatment.

⁴ Flow-through- Of orders designed to flow-through BellSouth's system which orders achieve the appropriate flow-through.

⁵ Acknowledgement Message Completeness- All orders submitted to BellSouth is acknowledged as received by BellSouth. This metric measures how many of those orders receive acknowledgement.

⁶ TAG = Telecommunications Access Gateway

⁷ CRIS = Customer Records Information System

⁸ NIW = Network Infrastructure Warehouse

⁹ LMOS = Loop Maintenance and Operations System

¹⁰ LNP = Local Number Portability

¹¹ OSPCM = Outside Plant Contract Management System

states as well as the disparate volumes of products ordered and access lines in place. Comparisons are further complicated by the fact that SEEMS commenced at different times in different states; therefore, every state is on a different three month cycle.

The following information illustrates a summary of performance measure results for the period that BellSouth submitted the Georgia Performance Plan with Tennessee specific information. This information starts with May data and ends with November data. Previous months data, though submitted to the Authority, was reviewed as part of the Section 271 evaluation. December marked the beginning of the Florida Performance Plan. The Florida plan varies dramatically in report structure from the Georgia Plan; therefore, it can not be adequately compared with prior month(s) results. The following information includes a summary of SEEM payments by category, and month, as well as a comparison to other BellSouth states. The information corresponds to performance results from August to November, which represents the time period that the Georgia Plan was ordered in the interim until the Florida Plan was effectuated.

Cc: Aster Adams, Eddie Roberson, Richard Collier, Telecom Staff

Summary and Comparison of BellSouth Performance Measurement Results for November 2002

Comparison with other BellSouth states:¹

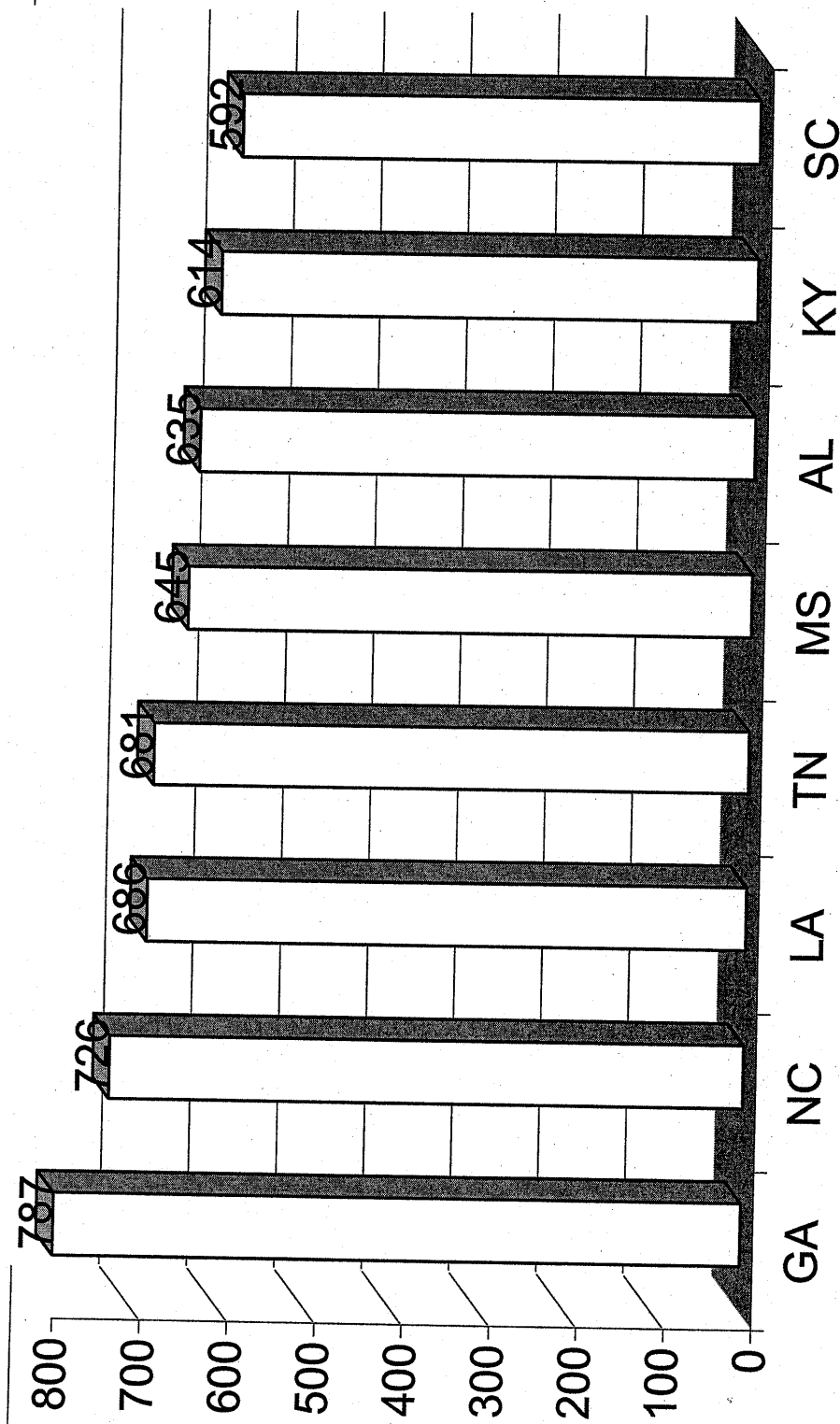
Tennessee ranked 4th among the eight comparable BellSouth states in terms of the number of total and UNE measurements for which requirements were met.

Trend

BellSouth's Tennessee results have improved slightly since May 2002, when it met requirements for 646 of its total measurements. By November 2002, BellSouth had met requirements for 681 of the measurements. BellSouth's performance on UNE measurements shows a similar general trend, increasing from 354 met in May 2002 to 380 met in November 2002.

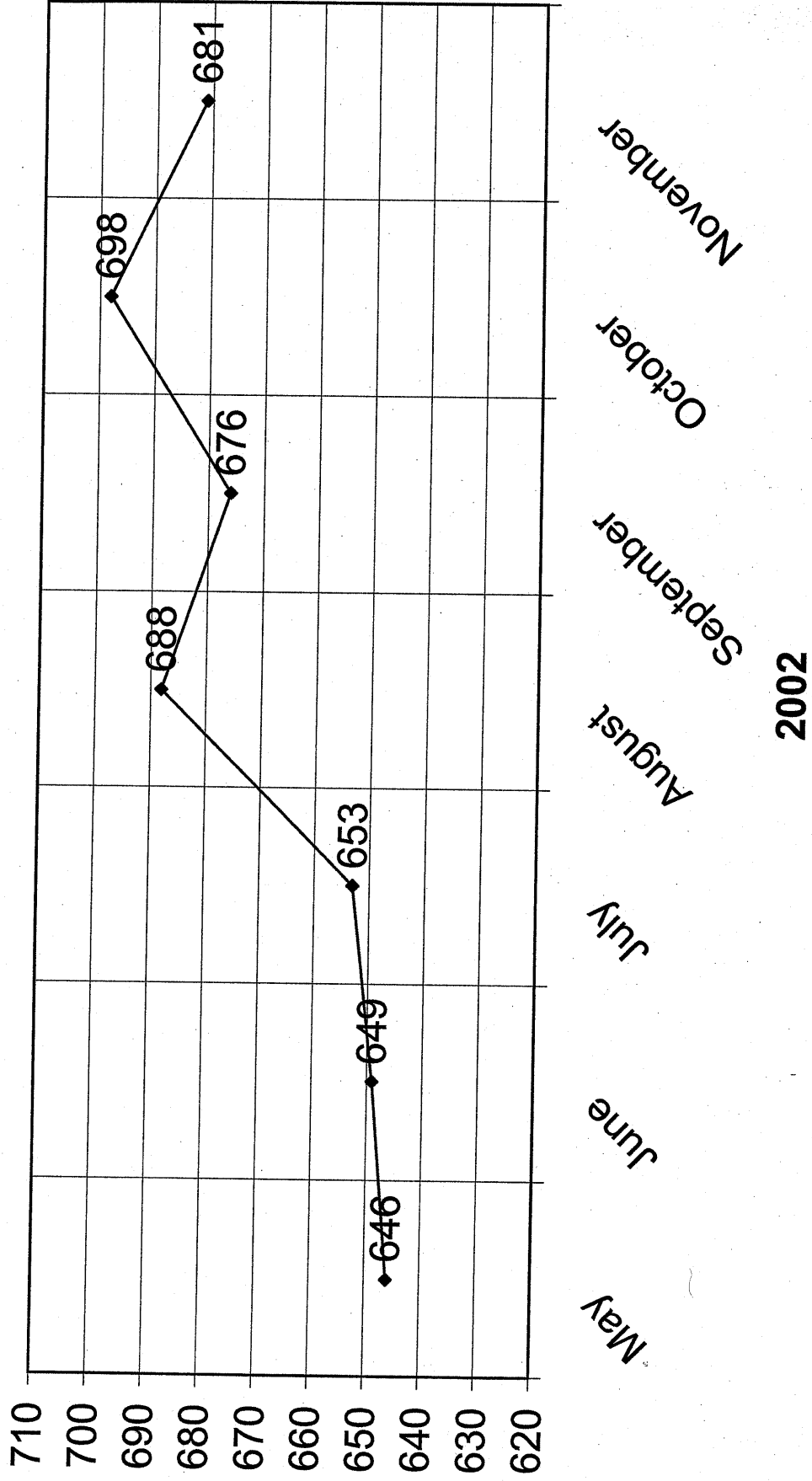
¹Tennessee's results cannot be compared with Florida, because Florida is on a different measurement plan. Beginning with December 2002, BellSouth will report its Tennessee results using the Florida plan.

Number of Total Measurements with Reported Data for Which BellSouth Met Requirements



November 2002

Number of Total Measurements with Reported Data for Which BellSouth Met Requirements



Summary of Total Tier I and Tier II Penalties

Summary of Total Tier I Penalties					
Category	August	September	October	November	
Total Billing	\$4,210.65	\$142,097.00	\$101,887.00	\$23,526.70	
Total Maintenance and Repair	\$131,721.79	\$137,100.00	\$80,275.00	\$81,351.69	
Total Provisioning	\$255,042.05	\$47,825.00	\$168,275.00	\$915,337.84	
Total Ordering	\$29,890.92	\$21,979.00	\$22,536.00	\$14,498.74	
Total Interconnection Trunks	\$0.00	\$400.00	\$0.00	\$0.00	
Total	\$0.00	\$0.00	\$0.00	\$0.00	

Summary of Total Tier II Penalties				
Submetric Description	Aug/Sept/Oct	Average penalty per access line	Sept/Oct/Nov	Average penalty per access line
Maintenance Average Duration- UNE Line Sharing	Remedy		Remedy	
Maintenance Average Duration- UNE Line Sharing (triple damages)	\$14,000.00		\$14,889.67	
Percent Flow-Through Service Request- Business	\$28,000.00		\$29,750.00	
Percent Flow-Through Service Request- Residence	\$2,220.00		\$1,990.42	
Percent Provisioning Troubles within 30 Days- UNE Line Sharing	\$38,640.00		\$23,221.51	
Reject Interval (Mechanized only)	\$9,625.00		\$0.00	
Order Completion Interval- UNE Loops	\$3,360.00		\$0.00	
Percent Repeat Troubles within 30 days- UNE Line Sharing			\$43,764.38	
TN Total	\$0.00		\$2,625.86	
CLEC Access lines in TN- 377,627		\$0.00	\$116,241.84	\$0.31

Comparison to other BellSouth States			
State	Access lines by state	Remedy	Remedy
Alabama	236,000	\$95,580.00	\$0.41
Florida	831,761	\$433,450.00	\$0.52
Georgia	798,000	\$933,321.00	\$1.17
Kentucky	95,000	\$176,237.00	\$1.86
Louisiana	227,500	\$1,025,356.00	\$4.51
Mississippi	110,000	N/A	N/A
North Carolina	358,000	\$384,614.66	\$1.07
South Carolina	173,000	N/A	N/A

Note- Mississippi and South Carolina had not had Performance Measures in place long enough to accrue Tier II penalties until December 2002.

APPENDIX

SEEMs

Summary of Self-Effectuating Enforcement Mechanisms

The following charts illustrate the Tier I and Tier II SEEM payments made by BellSouth. Tier I SEEMs (Self-Effectuating Enforcement Mechanisms) are payments made directly to CLECs in Tennessee for performance failures based on affected transaction volume. Tier II SEEMs are payments made to the TRA after three (3) consecutive months of performance failures. The SEEM plan commenced in Tennessee as of August, 2002. Tier I SEEM payments have been made to CLECs as of October, 2002, 45 days after the end of the August measurement cycle. Tier II SEEM payments have been made to the State as of December, 2002, 45 days after the end of the first three month measurement cycle.

The category which accrued the largest Tier I penalties for August and October is provisioning. The category in the month of September was billing. A possible explanation for the large billing penalty is that an error in rate, when applied to minutes of use, could affect thousands of transactions. Therefore applying \$1.00 per affected item rate for the billing category can result in a very large amount. A factor that can affect the amount of provisioning and maintenance and repair SEEMs is that failure in the UNE (Unbundled Network Elements) category requires a higher payment than other categories. In fact, the dollar amount for UNE failures is four times that of other product types in the provisioning and maintenance and repair categories.

In the month of November there was a spike in Tier I payments. The Tier I payments had been averaging approximately \$380,000 a month but in November the amount jumped to \$1,034,714.97. The increase came from the measure Order Completion Interval- UNE Loop and Port Combination. That particular measure had previously produced SEEM penalty amounts in the low six figure range but swelled to \$786,808.59 in November.

The category which accrued the largest Tier II penalties, after three consecutive months of performance failures was the Ordering category more specifically the flow-through measures for Business and Residence and the Provisioning measure for Order Completion Interval. Penalty amounts in both categories are in excess of \$40,000 for their respective months. There were only 5 measures that failed to meet the benchmark or parity for the three consecutive months of August, September and October. They are: Maintenance Average Duration- Line Sharing; Percent Flow-through Service Request Business; Percent Flow-through Service Request Residence; Percent Provisioning Troubles within 30 Days- UNE Line Sharing; and Reject Interval. For the three consecutive months of September, October and November the failures included: Maintenance Average Duration- UNE Line Sharing, Order Completion Interval- UNE Loops and Percent Repeat Troubles within 30 days- UNE Line Sharing. The category Maintenance Average Duration- UNE line Sharing appears twice on the chart to denote triple damages. Triple damages occur when BellSouth triggers a Tier II penalty for advanced and nascent services.

The average penalty per CLEC access line in Tennessee is \$.25 and \$.24 for December and January respectively. If you compare those penalties versus another BellSouth state with comparable access lines (i.e.- North Carolina which has 358,000 access lines to Tennessee's 377,627) North Carolina's per access line amount is \$1.07 and \$.09 for December and January respectively. This can be explained simply because the SEEM plan is dynamic in nature and penalties are not calculated on a rolling month basis. Some months will have payments for multiple months' failure. This is the case for North Carolina in December when the measure for flow-through included two months of remedy payments, while some months only have a single month's failure.

As an illustration, North Carolina Residential Flow-through measure for December's SEEM, which is a regional measure, has experienced consistent failures over the course of the year. This results in SEEM payments for multiple months of performance failure. Other states have received payment for September and October (the first three month failure occurred in July, August and September and the second occurred in August, September and October). For January's SEEM, flow-through was not listed as a measure which warranted penalties thus the decline in month over month payments for the state of North Carolina. If BellSouth fails to improve its performance in this area, Tennessee can anticipate the same treatment in months to come, because, the payments do not appear to payout on a rolling month's basis.

Tier I Penalties by MSS Category

Metric Category	August	September	October	November
Resale				
Percent Repeat Troubles within 30 Days - Design	\$0.00	\$100.00	\$100.00	\$0.00
Percent Repeat Troubles within 30 Days - POTS	\$900.16	\$1,025.00	\$1,300.00	\$550.18
Customer Trouble Report Rate - Design	\$200.04	\$550.00	\$475.00	\$325.10
Customer Trouble Report Rate - POTS	\$800.14	\$1,250.00	\$975.00	\$3,851.27
Maintenance Average Duration - POTS	\$1,000.19	\$1,900.00	\$1,300.00	\$600.19
Maintenance Average Duration- Design				\$100.03
Percent Missed Repair Appointments - POTS	\$600.12	\$725.00	\$725.00	\$400.13
Percent Missed Installation Appointments - POTS	\$1,000.18	\$525.00	\$475.00	\$325.10
Percent Provisioning Troubles within 30 Days - Design	\$0.00	\$0.00	\$100.00	\$0.00
Percent Provisioning Troubles within 30 Days - POTS	\$1,200.22	\$1,300.00	\$825.00	\$2,000.65
Order Completion Interval - POTS	\$800.15	\$400.00	\$1,475.00	\$100.03
Subtotal	\$6,501.20	\$7,775.00	\$7,750.00	\$8,252.68

UNE

Percent Repeat Troubles within 30 Days - UNE XDSL	\$0.00	\$400.00	\$0.00	\$400.13
Percent Repeat Troubles within 30 days - UNE Loops	\$1,600.28	\$450.00	\$3,200.00	\$1,250.41
Percent Repeat Troubles within 30 Days - UNE Line Sharing	\$0.00	\$800.00	\$0.00	\$2,400.79
Percent Repeat Troubles within 30 Days - UNE Loop and Port Combos	\$1,200.21	\$1,250.00	\$0.00	\$6,001.97
Percent Troubles in 7 days - Hot Cuts	\$0.00	\$400.00	\$1,600.00	\$0.00
Customer Trouble Report Rate - UNE Loops and Port Combos	\$5,600.92	\$800.00	\$0.00	\$10,403.42
Customer Trouble Report Rate - UNE Loops	\$102,016.78	\$101,250.00	\$50,700.00	\$35,861.77
Customer Trouble Report Rate - UNE XDSL	\$0.00	\$0.00	\$400.00	\$0.00
Customer Trouble Report Rate- Line Sharing				\$800.26
Maintenance Average Duration - UNE Loops	\$800.14	\$800.00	\$400.00	\$3,601.18
Maintenance Average Duration - UNE XDSL	\$400.07	\$800.00	\$400.00	\$850.28
Maintenance Average Duration - UNE Loop and Port Combos	\$400.07	\$2,000.00	\$3,650.00	\$0.00
Maintenance Average Duration - UNE Line Sharing	\$5,200.85	\$8,100.00	\$9,000.00	\$7,152.35
Percent Missed Repair Appointments - UNE Loops	\$0.00	\$800.00	\$3,250.00	\$400.13
Percent Missed Repair Appointments - UNE Loop and Port Combos	\$10,401.71	\$13,200.00	\$2,800.00	\$6,402.10
Percent Missed Repair Appointments- UNE Line Sharing	\$400.07	\$0.00	\$0.00	\$0.00
Percent Missed Installation Appointments - UNE Loops	\$800.14	\$1,600.00	\$3,300.00	\$1,850.61
Percent Missed Installation Appointments - UNE Loop and Port Combos	\$4,000.68	\$3,750.00	\$3,050.00	\$2,950.96

Shaded sections denote measures identified by Staff in the 271 Memo as "measures to watch".

Tier I Penalties by MSS Category

Percent Missed Installation Appointments-UNE xDSL				\$400.13
Percent Missed Installation Appointments-UNE Line Sharing	\$400.07	\$0.00	\$400.00	\$0.00
Percent Provisioning Troubles within 30 Days - UNE XDSL	\$0.00	\$800.00	\$0.00	\$0.00
Percent Provisioning Troubles within 30 Days - UNE Line Sharing	\$4,800.79	\$5,400.00	\$5,000.00	\$0.00
Percent Provisioning Troubles within 30 Days - UNE Loops	\$1,600.28	\$11,700.00	\$4,250.00	\$3,401.11
Percent Provisioning Troubles within 30 Days - UNE Loop and Port Combos	\$0.00	\$15,200.00	\$19,700.00	\$94,693.16
Order Completion Interval - UNE Loop and Port Combos	\$233,238.34	\$400.00	\$116,400.00	\$786,808.59
Order Completion Interval -UNE XDSL without Conditioning	\$2,000.33	\$450.00	\$0.00	\$0.00
Order Completion Interval - UNE Loops	\$1,200.21	\$6,300.00	\$9,200.00	\$14,154.66
Order Completion Interval- UNE Line Sharing	\$4,000.66	\$0.00	\$4,000.00	\$8,552.81
Subtotal	\$380,062.60	\$176,650.00	\$240,700.00	\$988,336.82

Local Interconnection Trunks

Trunk Group Performance CLEC Specific	\$0.00	\$400.00	\$0.00	\$0.00
Customer Trouble Report Rate - IC-Trunks	\$100.02	\$500.00	\$0.00	\$0.00
Maintenance Average Duration- IC Trunks	\$100.02	\$0.00	\$0.00	\$0.00
Order Completion Interval - IC Trunks	\$0.00	\$0.00	\$100.00	\$100.03
Subtotal	\$200.04	\$900.00	\$100.00	\$100.03

General*

Billing Invoice Accuracy	\$3,714.61	(\$46.00)		\$23,216.61
Billing Mean Time to Deliver Invoices -- CABS	\$363.04	\$10.00	\$3.00	\$310.09
Billing Mean Time to Deliver Invoices -- CRIS	\$125.00	\$39.00	\$17.00	\$0.00
Usage Data Delivery Accuracy	\$8.00			\$0.00
Billing Invoice Accuracy		\$142,094.00	\$101,867.00	\$0.00
Firm Order Confirmation Timeliness (Partially Mechanized)	\$920.16	\$520.00	\$180.00	\$300.10
Firm Order Confirmation Timeliness (Mechanized only)	\$880.15	\$640.00	\$640.00	\$180.06
Percent Flow-Through Service Request (Detail) -LNP	\$496.09	\$1,270.00	\$2,096.00	\$3,234.06
Percent Flow-Through Service Request (Detail) -Business	\$1,355.22	\$1,375.00	\$1,027.00	\$751.23
Percent Flow-Through Service Request	\$11,364.87	\$2,686.00	\$4,478.00	\$3,828.26
Reject Interval (Mechanized only)	\$4,240.70	\$3,430.00	\$4,220.00	\$1,700.57
Percent Flow-Through Service Request (Detail) -Residence	\$10,411.71	\$12,058.00	\$9,808.00	\$4,504.46
Acknowledgement completeness	\$222.02	\$0.00	\$87.00	\$0.00
Subtotal	\$34,101.57	\$164,076.00	\$124,423.00	\$38,025.44

Total	\$420,865.41	\$349,401.00	\$372,973.00	\$1,034,714.97
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* This category may contain data applicable to the UNE, Resale or Interconnection Trunks category that cannot be distinguished.

Shaded sections denote measures identified by Staff in the 271 Memo as "measures to watch".

Tier I penalties paid by category and sub-category

	August	September	October	November
Submetric Description	Remedy	Remedy	Remedy	Remedy
Billing				
Billing Invoice Accuracy	\$3,714.61	(\$46.00)		\$23,216.61
Billing Mean Time to Deliver Invoices -- CABS	\$363.04	\$10.00	\$3.00	\$310.09
Billing Mean Time to Deliver Invoices -- CRIS	\$125.00	\$39.00	\$17.00	\$0.00
Usage Data Delivery Accuracy	\$8.00			\$0.00
Billing Invoice Accuracy		\$142,094.00	\$101,867.00	\$0.00
Subtotal	\$4,210.65	\$142,097.00	\$101,887.00	\$23,526.70

Maintenance & Repair

Percent Repeat Troubles within 30 Days - Design	\$0.00	\$100.00	\$100.00	\$0.00
Percent Repeat Troubles within 30 Days - UNE XDSL	\$0.00	\$400.00	\$0.00	\$400.13
Percent Repeat Troubles within 30 days - UNE Loops	\$1,600.28	\$450.00	\$3,200.00	\$1,250.41
Percent Repeat Troubles within 30 Days - UNE Line Sharing	\$0.00	\$800.00	\$0.00	\$2,400.79
Percent Repeat Troubles within 30 Days - POTS	\$900.16	\$1,025.00	\$1,300.00	\$550.18
Percent Repeat Troubles within 30 Days - UNE Loop and Port Combos	\$1,200.21	\$1,250.00	\$0.00	\$6,001.97
Percent Troubles in 7 days - Hot Cuts	\$0.00	\$400.00	\$1,600.00	\$0.00
Customer Trouble Report Rate - IC-Trunks	\$100.02	\$500.00	\$0.00	\$0.00
Customer Trouble Report Rate - Design	\$200.04	\$550.00	\$475.00	\$325.10
Customer Trouble Report Rate - UNE Loops and Port Combos	\$5,600.92	\$800.00	\$0.00	\$10,403.42
Customer Trouble Report Rate - POTS	\$800.14	\$1,250.00	\$975.00	\$3,851.27
Customer Trouble Report Rate - UNE Loops	\$102,016.78	\$101,250.00	\$50,700.00	\$35,861.77
Customer Trouble Report Rate - UNE XDSL	\$0.00	\$0.00	\$400.00	\$0.00
Customer Trouble Report Rate- Line Sharing				\$800.26
Maintenance Average Duration - UNE Loops	\$800.14	\$800.00	\$400.00	\$3,601.18
Maintenance Average Duration - UNE XDSL	\$400.07	\$800.00	\$400.00	\$850.28
Maintenance Average Duration - POTS	\$1,000.19	\$1,900.00	\$1,300.00	\$600.19
Maintenance Average Duration - UNE Loop and Port Combos	\$400.07	\$2,000.00	\$3,650.00	\$0.00
Maintenance Average Duration - UNE Line Sharing	\$5,200.85	\$8,100.00	\$9,000.00	\$7,152.35
Maintenance Average Duration- IC Trunks	\$100.02	\$0.00	\$0.00	\$0.00
Maintenance Average Duration- Design				\$100.03
Percent Missed Repair Appointments - POTS	\$600.12	\$725.00	\$725.00	\$400.13
Percent Missed Repair Appointments - UNE Loops	\$0.00	\$800.00	\$3,250.00	\$400.13
Percent Missed Repair Appointments - UNE Loop and Port Combos	\$10,401.71	\$13,200.00	\$2,800.00	\$6,402.10
Percent Missed Repair Appointments- UNE Line Sharing	\$400.07	\$0.00	\$0.00	\$0.00
Subtotal	\$131,721.79	\$137,100.00	\$80,275.00	\$81,351.69

Provisioning

Percent Missed Installation Appointments - POTS	\$1,000.18	\$525.00	\$475.00	\$325.10
Percent Missed Installation Appointments - UNE Loops	\$800.14	\$1,600.00	\$3,300.00	\$1,850.61
Percent Missed Installation Appointments - UNE Loop and Port Combos	\$4,000.68	\$3,750.00	\$3,050.00	\$2,950.96
Percent Missed Installation Appointments- UNE xDSL				\$400.13
Percent Missed Installation Appointments- UNE Line Sharing	\$400.07	\$0.00	\$400.00	\$0.00
Percent Provisioning Troubles within 30 Days - UNE XDSL	\$0.00	\$800.00	\$0.00	\$0.00
Percent Provisioning Troubles within 30 Days - Design	\$0.00	\$0.00	\$100.00	\$0.00
Percent Provisioning Troubles within 30 Days - POTS	\$1,200.22	\$1,300.00	\$825.00	\$2,000.65
Percent Provisioning Troubles within 30 Days - UNE Line Sharing	\$4,800.79	\$5,400.00	\$5,000.00	\$0.00
Percent Provisioning Troubles within 30 Days - UNE Loops	\$1,600.28	\$11,700.00	\$4,250.00	\$3,401.11
Percent Provisioning Troubles within 30 Days - UNE Loop and Port Combos	\$0.00	\$15,200.00	\$19,700.00	\$94,693.16
Order Completion Interval - POTS	\$800.15	\$400.00	\$1,475.00	\$100.03
Order Completion Interval - UNE Loop and Port Combos	\$233,238.34	\$400.00	\$116,400.00	\$786,808.59
Order Completion Interval -UNE XDSL without Conditioning	\$2,000.33	\$450.00	\$0.00	\$0.00
Order Completion Interval - UNE Loops	\$1,200.21	\$6,300.00	\$9,200.00	\$14,154.66

Shaded sections denote measures identified by Staff in the 271 Memo as "measures to watch".

Tier I penalties paid by category and sub-category

Order Completion Interval- UNE Line Sharing	\$4,000.66	\$0.00	\$4,000.00	\$8,552.81
Order Completion Interval - IC Trunks	\$0.00	\$0.00	\$100.00	\$100.03
Subtotal	\$255,042.05	\$47,825.00	\$168,275.00	\$915,337.84

Ordering

Firm Order Confirmation Timeliness (Partially Mechanized)	\$920.16	\$520.00	\$180.00	\$300.10
Firm Order Confirmation Timeliness (Mechanized only)	\$880.15	\$640.00	\$640.00	\$180.06
Percent Flow-Through Service Request (Detail) -LNP	\$496.09	\$1,270.00	\$2,096.00	\$3,234.06
Percent Flow-Through Service Request (Detail) -Business	\$1,355.22	\$1,375.00	\$1,027.00	\$751.23
Percent Flow-Through Service Request (Detail) -UNE	\$11,364.87	\$2,686.00	\$4,478.00	\$3,828.26
Reject Interval (Mechanized only)	\$4,240.70	\$3,430.00	\$4,220.00	\$1,700.57
Percent Flow-Through Service Request (Detail) -Residence	\$10,411.71	\$12,058.00	\$9,808.00	\$4,504.46
Acknowledgement completeness	\$222.02	\$0.00	\$87.00	\$0.00
Subtotal	\$29,890.92	\$21,979.00	\$22,536.00	\$14,498.74

Interconnection Trunks

Trunk Group Performance CLEC Specific	\$0.00	\$400.00	\$0.00	\$0.00
Subtotal	\$0.00	\$400.00	\$0.00	\$0.00
Total TN Tier I payment	\$420,865.41	\$349,401.00	\$372,973.00	\$1,034,714.97

Comparison with Other BellSouth States

CLEC Access Lines	State	September Remedy	October Remedy	November Remedy
236,000	AL	\$215,174.00	\$378,045.19	\$235,985.32
831,761	FL	\$1,819,050.00	\$2,361,521.87	\$2,242,785.91
798,000	GA	\$720,426.00	\$1,067,698.00	\$1,508,904.82
95,000	KY	\$103,347.00	\$534,007.00	\$629,353.76
227,500	LA	\$343,580.00	\$387,240.00	\$241,850.93
110,000	MS	\$268.00	\$111,300.00	\$164,514.93
358,000	NC	\$189,736.00	\$134,011.00	\$779,539.17
173,000	SC	\$450.00	\$181,700.00	\$404,232.80
377,627	TN	\$349,401.00	\$372,973.00	\$1,034,714.97
Subtotal other BellSouth states		\$3,741,432.00	\$5,528,496.06	\$7,241,882.61
Total all BellSouth states		\$4,090,833.00	\$5,528,496.06	\$8,276,597.58

Shaded sections denote measures identified by Staff in the 271 Memo as "measures to watch".